

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING**

Subject to and without waiving any defenses, including without limitation all defenses available under Fed. R. Civ. P. 12, Defendants BP Products North America Inc., BP America Inc., BP America Production Company Inc., and BP Exploration & Production Inc. (collectively, the "BP Defendants") hereby move the Court for a thirty (30) day extension of time in which to file a responsive pleading to Third Party Plaintiff Plash Island Resort, L.L.C.'s Complaint to and including March 31, 2011. As grounds for this motion, the BP Defendants show unto the Court the following:

1. The BP Defendants have been named in hundreds of cases filed in various state and federal courts arising out of an explosion and fire onboard the Deepwater Horizon drilling rig on April 20, 2010, and the ensuing oil spill from the BP well located on Mississippi Canyon Block 252. Many of these actions are

now consolidated in Multidistrict Litigation in the Eastern District of Louisiana. Because of the sheer number of related actions filed in multiple jurisdictions and the numerous allegations in the complaints, the BP Defendants need additional time in which to prepare appropriate motions, answers or other responses to the Complaint.

2. Extensions of time to respond to the Complaint have been granted in virtually all related cases pending in Alabama. An order granting this motion will not result in any demonstrable prejudice to Plaintiff.

3. Plaintiff does not oppose this request.

WHEREFORE, the BP Defendants respectfully request that the Court enter an order extending the deadline for the BP Defendants to file a responsive pleading to and including March 31, 2011.

Dated: February 25, 2011.

Respectfully submitted,

s/ William H. Brooks

John M. Johnson

William H. Brooks

Marchello D. Gray

**LIGHTFOOT, FRANKLIN & WHITE,
L.L.C.**

400 North 20th Street

Birmingham, Alabama 35203

Tel: (205) 581-0700

Fax: (205) 581-0799

JJohnson@lightfootlaw.com

WBrooks@lightfootlaw.com

MGray@lightfootlaw.com

Attorneys for Defendants
BP Products North America Inc., BP
America Production Company Inc.,
BP America Inc. and BP
Exploration & Production Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record for all parties..

s/ *William H. Brooks*

Of Counsel